



## U.S. Department of Justice

United States Attorney  
Southern District of New York

**MEMORANDUM ENDORSED**

The Jacob K. Javits Building  
26 Federal Plaza, 37<sup>th</sup> Floor  
New York, New York 10278

August 5, 2024

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**By ECF**

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Abdi Hussein Ahmad*, S1 19 Cr. 338 (GHW)**

Dear Judge Woods:

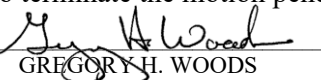
The Government respectfully requests an extension of time to respond to the Court's Order of June 28, 2024, directing the Government to file a statement of its position regarding whether the defendant's sentence should be modified in light of Amendment 821 to the United States Sentencing Guidelines. (ECF No. 251).

Because the previously assigned Assistant United States Attorneys have left the U.S. Attorney's Office, no Government attorney received notice of the Court's Order of June 28, 2024, or the defendant's motion of July 2, 2024. (ECF No. 252). The undersigned counsel for the Government was just assigned to this matter. Accordingly, the Government requests additional time to obtain and review records, to consider the Government's position on the motion, and to draft its response. The Government respectfully requests leave to file its response on or before August 15, 2024 (*i.e.*, within ten days of today, the same amount of time that the Court originally granted the Government to respond).

Application granted. The deadline for the Government to file a statement of its position on the modification of the defendant's sentence is extended to August 15, 2024. The defendant's response is extended to August 29, 2024. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 255.

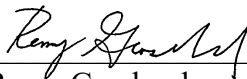
SO ORDERED.

Dated: August 7, 2024  
New York, New York

  
GREGORY H. WOODS  
United States District Judge

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by:   
Remy Grosbard  
Assistant United States Attorney  
(212) 637-2446

cc: All Counsel of Record